

The Soap and Detergent Association 475 Park Avenue South, New York, NY 10016

THE COSMETIC, TOILETRY, AND FRAGRANCE ASSOCIATION

May 12, 1999

John J. Guzewich Center for Food Safety and Applied Nutrition (HFS-605) Food and Drug Administration 200 C Street, SW Washington, DC 20204

Re: Docket No. 99N-0438

Request for Data and Information on Contamination of Ready-to-Eat Foods Associated with Food Preparation Employees

Dear Dr. Guzewich:

The Soap and Detergent Association (SDA) is a national trade organization representing more than 130 companies that formulate cleaning products or supply the ingredients and packaging used for those formulations. The Cosmetic, Toiletry, and Fragrance Association (CTFA) is the leading national trade association for the personal care products industry, with more than 500 member companies. Since 1994, a coalition of member companies of SDA and CTFA have been working to obtain Over-the-Counter (OTC) Monograph regulations for topical antimicrobial products consistent with public health needs in domestic, institutional, and professional settings.

Members of the SDA/CTFA coalition would like to respond to FDA's request for data and information on contamination of ready-to-eat foods associated with food preparation employees published on April 2, 1999 in the Federal Register. In order to provide an accurate and thorough response, the coalition has embarked on an extensive literature search to obtain new and existing articles and review them for their scientific accuracy and relevance. Given the scope and magnitude of this data search, we need additional time to respond properly.

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99N-0438

We therefore request FDA to extend the period for submitting data and information for an additional sixty (60) days to properly respond to the issues raised by the agency in its notice. With adequate time for a thorough review and synthesis of the data requested, our members will provide the agency with quality information and an overall perspective which FDA is seeking. We believe it is in the public interest for FDA to grant this extension of time in which to respond. Thank you for your consideration.

Respectfully submitted,

Thomas J. Donegan, Jr.

Vice President-Legal and General Counsel

The Cosmetic, Toiletry, and Fragrance Association

Jenan Al-Atrash, Dr. P.H.

Director, Public Health and Safety

The Soap and Detergent Association

cc: Dockets Management Branch, FDA

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